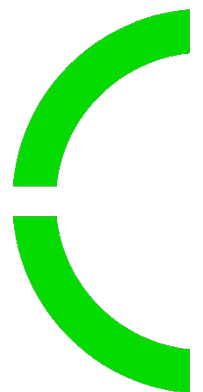


# Planon Code of Conduct



## Purpose:

At Planon, we understand and underscore the importance of upholding responsible and sustainable environmental, social, and governance practices. Environmental, Social, and Governance ('**ESG**') is becoming increasingly important in today's society as investors, shareholders, and consumers alike are placing more emphasis on sustainability, ethical business practices, and corporate responsibility. For Planon it is crucial to recognise the value of ESG as a tool to create sustainable and profitable businesses in the current economic climate. As such, we have developed this Code of Conduct to ensure that our processes are compliant with the relevant ESG requirements. This policy replaces the 'Global ESG Policy' dated October 2023.

As with all Planon policies, this Code of Conduct will be:

- reviewed periodically, in light of any changes within legislation, the Planon Group organisation and other factors;
- implemented through guidelines to help every Planon Employee understand and adhere to
- the relevant aspects of this Code of Conduct in their day-to-day activities through regular training
- communicated to all Planon Employees asking from them to work in an environmentally responsible manner as much as possible. In order to educate and to raise awareness of environmental issues Planon Employees will receive appropriate training.

## Objectives:

Our objectives are divided into different aspects:

- **Environmental:** Our objective is to reduce our environmental footprint by implementing practices that conserve resources, protect biodiversity, mitigate climate change, and promote sustainable waste management. We aim to measure and report our greenhouse gas emissions, set reduction targets, and continuously improve our practices to promote a low-carbon economy.
- **Social:** We believe that our organisation has a social responsibility to uphold human rights, promote diversity, and provide safe and fair working conditions. We aim to develop an inclusive culture that fosters equity, belonging and social sustainability. Our objective is to engage with local communities, support social initiatives, and promote responsible sourcing.
- **Governance:** Our objective is to operate with the highest ethical and professional standards, foster transparency, and promote accountability. We aim to promote ethical behaviour within our organisation, ensure compliance with legal and regulatory requirements, and provide transparent communication with our stakeholders.

## Scope:

This policy outlines the norms, rules, and responsibilities we expect in our organisation's operations and practices. It applies to all employees, partners and vendors who interact with our organisation in any capacity. Our commitment to ESG responsibilities is derived from our belief that we have a social and ethical obligation to uphold ESG standards and contribute to building a sustainable future for all.

## Policy Owner:

Chief Strategy Officer

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## Definitions

“**Annual Report**” means the most current comprehensive report by the Executive Board on the activities of the Planon Group throughout the preceding year.

“**Executive Board**” means the management team of the Planon Group as defined in the Annual Report.

“**Planon Group**” means the group of companies consisting of Planon Beheer B.V. and its subsidiaries. Reference in this Environmental Policy to ‘**we**’, ‘**our**’, ‘**Planon**’, refers to the Planon Group unless the context indicates otherwise.

“**Planon Legal Entity**” means a legal entity which is part of the Planon Group.

“**Planon Employee**” means an employee of a Planon Legal Entity. Reference to ‘employee(s)’, ‘our employees’ refers to all Planon Employees unless stated otherwise.

## Environmental

The Planon Group is committed to providing a safe and healthy workplace for its employees and to minimise potential impact of its operations on the environment. The Planon Group is committed to:

1. Continuous improvement of its environmental performance;
2. Complying with environmental legislation, regulations and codes of practice with respect to environment and relevant to the industry sector;
3. Preventing pollution and minimising production of waste.

## Environmental principles

We are committed to:

- Integrating the consideration of environmental concerns and impacts into our decision making and activities;
- Meeting our duty of care requirements in relation to waste, make efficient use of materials and resources and endorse sustainable processing of waste;
- Endorsing external initiatives in the field of environmental sustainability;
- Reducing CO2 emissions;
- Delivering products and services with the smallest environmental burden as possible;
- Purchasing and use environmentally responsible products accordingly;
- Communicating our environmental commitment to suppliers, customers and the public and encouraging them to support it;
- Stimulating improvement of 'green growth' development plans;
- Undertaking to assess continuously the environmental impact of our products and operations;
- And promoting environmental awareness among our employees and encouraging them to work in an environmentally responsible manner.

## Social

We are dedicated to:

- Promoting an ethical corporate culture;
- Achieving responsible commercial success, recognising that the Planon Group will be challenged to balance the core values below against each other, always mindful of its promise to shareholders, employees, customers, suppliers, and other stakeholders.

## Ethical behaviour

We adhere to legal and ethical standards applicable in the business. We are committed to meeting our contractual requirements. In order to safeguard ethical behaviour, we hold ourselves to the values below:

- **Respect.** We will be open, transparent, and direct in our communication and receptive to other views. We will honour and value the abilities and contributions of others, embracing the responsibility and accountability for our actions in this regard.
- **Honesty.** We will not make false statements. We will never deliberately mislead. We will be as honest as possible, openly and freely sharing information, as appropriate to the relationship.
- **Fairness.** We will create and follow a process and achieve outcomes that a reasonable person would call just, even-handed, and non-arbitrary.
- **Compassion.** We will maintain an awareness of the needs of others and act to meet those needs whenever possible. We will also minimise harm whenever possible. We will act in ways that are consistent with our commitment to social responsibility.

## Unethical behaviour

We always strive to be fair and objective in our advice and actions, and will never be influenced in decisions, actions or recommendations by gender, race, religion, colour, age, or personal disability. To clarify which behaviour is not accepted, the Planon Group defines ethical behaviour in general and outlines prohibited behaviour in its handbooks and guidelines.

If you are a Planon employee, please consult the relevant paragraphs of your employment contract and the country-specific handbook for additional information.

## Compliance with the law and duty of care

We believe that all businesses and organisations should avoid causing adverse effects on human rights of people, environments, and the wellbeing of society at large. In all of the Planon Group activities, we pursue to adhere to applicable local and international laws, regulations, customs, and cultures and carefully weigh the interests of our various stakeholders.

In order to safeguard the duty of care, all Planon employees shall conduct their personal affairs in such a way that their duties and responsibilities to the company are not jeopardised and/or legal questions do not arise with respect to their association or work with the company. If you are a Planon Employee, please consult the relevant paragraphs of your employment contract and the country-specific handbook for additional information.

Furthermore, we are open to reasonable audits and other inquiries to check the company's compliance.

## Fair Business practices

### Standards of business partners

We expect suppliers, resellers, distributors, and other partners of the Planon Group to work according to business principles as set forth in this Code of Conduct. Planon Employees must therefore always check and document the integrity when approaching and contracting relevant third parties and ensure that appropriate remuneration is only paid for product and/or services actually provided. If you are a Planon Employee, please consult the relevant paragraphs of your employment contract and the country-specific handbook for additional information.

## Property and Confidentiality

### Confidentiality

In order to safeguard confidentiality, all Planon Employees have a responsibility in protecting the company's assets including company information and ensuring that it is used for internal business purposes only and in accordance with the applicable company policies. We strive to handle customer information responsibly and to take reasonable and appropriate measures to protect customer information from misuse.

### Property

We consider the company's various types of intellectual property as highly valuable assets. For that reason, we will secure and protect our intellectual property rights and take appropriate action against unauthorised use. Just as we expect others to respect the intellectual property rights of the Planon Group, we are committed to respecting their intellectual property rights.

In order to safeguard our property, the Planon Group retains the rights in, and ownership of, all intellectual property that is created by Planon Employees unless agreed otherwise in advance.

## Conflict of interest

Planon Employees should avoid any situation that involves a conflict between business and personal interests. Each Planon Employee should act in the best interests of the Planon Group, and should not use company property, information, or its position within the company for private gain or to obtain favours or benefits.

To avoid conflict of interest, the Planon Group provides clear examples to clarify the definition of conflict of interest to our employees. We resolve conflicts of interest through disclosure and waiver.

If you are a Planon Employee, please consult the relevant paragraphs of your employment contract and the country-specific handbook for additional information.

## Governance

The Planon Business Principles prescribe the corporate values of the Planon Group and the responsibilities we have towards society and the environment worldwide: we act with integrity, we are open and clear, we respect each other, and we are socially and environmentally responsible. In all our activities, we pursue to adhere to local laws, regulations, customs and cultures and we carefully weigh the interests of our various stakeholders: employees, customers, business relations and suppliers, society at large and shareholders.

On an annual basis, the Planon Group reports in its Annual Report on how our core principles are implemented by the Planon Group.

## Sustainable Governance

We:

- Encourage resource reduction;
- Endorse sustainable processing of waste;
- Stimulate improvement of 'green growth' development;
- Aim to deliver products and services with the least environmental burden as possible;
- Pursue transportation of goods and employees with the least environmental burden as possible including the lowest air emission burden as possible;

If you are a Planon Employee, you can find more guidance on this topic by consulting the Corporate Policies Page of the internal portal.

## HR and Workplace environment

We:

- Respect (international) treaties regarding child labour, contribute to the effective abolition of child labour, take adequate steps to ensure that forced or compulsory labour does not exist in Planon's and its suppliers' activities, see our Policy Modern Slavery Act;
- Promote anti-harassment, non-discrimination and act respectful to all Planon Employees, applicants and external hires;
- Agree to free participation in labour unions, free participation and access for all regarding staff representation and works councils;
- Provide working conditions and employee benefits according to and following international laws and/or local law, in each case those regulations which provide the best standards;
- Aim to be in compliance with all mandatory employee regulations. We invest in a healthy and safe working environment in which we stimulate the well-being of our employees.
- With respect to diversity, we are committed to ensuring that our business activities such as hiring, training, compensation, promotions, transfers, terminations and Planon-sponsored social and recreational activities are conducted without discrimination based on race, colour, genetics, religion, gender, sexual orientation, national origin, disability, or age.

If you are a Planon Employee, you can find more guidance on this topic by consulting the Corporate Policies Page of the internal portal.



## Competition and Anti-bribery, Fair and International Business Practices

We:

- Pursue to adhere to local and international laws, regulations, customs and cultures and we carefully weigh the interests of our various stakeholders;
- Expect from all Planon Employees integrity and open rules of engagement regarding internal and external business relations and to comply with applicable laws and regulatory requirements;
- Expect from all Planon Employees strict separation of private and business interests;
- Respect competition regulations, will not participate in corruption, price agreements and other competition-disturbing activities and shall compete fairly in the marketplace;
- Incorporate these core principles in competition & anti-bribery guidelines to our policies and ensure that violation of such guidelines shall have consequences to those persons involved in the violation(s);
- Are open for reasonable audits and other inquiries to check the company's compliance;
- Avoid conflicts of interests.

If you are a Planon employee, you can find more guidance on this topic by consulting the Corporate Policies Page of the internal portal.

## Purchase

We:

- Implement and maintain a Purchase Policy respecting this Code of Conduct;
- Aim to contract with suppliers that have agreed to the Purchase Policy;
- Stimulate and are involved with suppliers who implement (elements) of the Purchase Policy in their business;
- Prefer to purchase non-environmentally burdensome products and goods.

If you are a Planon Employee, you can find more guidance on this topic by consulting the Corporate Policies Page of the internal portal.

## Whistleblower Service

This policy attests that Planon aims to act in accordance with the law, with integrity and in an ethically sustainable manner. It is important for us to learn of potential misconduct and to put a stop to it in the long term. Our digital whistleblowing service allows reporting of misconduct, fraud, corruption, or other illegal activities within a work-related context without fear of retaliation for the reporter. Employees as well as business partners, customers or other people can submit a report via our [whistleblower service](#).